

4. Plaintiff's counsel conferred with counsel for defendants regarding their willingness to agree to this Motion for Leave, and those attempts to confer are continuing to this day, but the most recent statement, made on September 18, 2014, was that the Defendants have not yet taken a position on this Motion for Leave. Consequently, this Motion for Leave should be considered OPPOSED.

5. Plaintiff's Reply will assist the Court because it eliminates many of the discovery items contained in Plaintiff's Motion to Compel. After Plaintiff's Motion to Compel was filed, the parties were successful in resolving many of the items contained in the Plaintiff's Motion to Compel. Therefore, the Reply focuses this Court's attention on the only items that remain in dispute and require the Court's action.

6. Because the Reply assists the Court by narrowing the scope of items that require the Court's attention, and because no party will be prejudiced by the filing of the Reply, this Motion for Leave should be both unopposed and granted.

7. WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this Court grant Plaintiff's Unopposed Motion for Leave to file Plaintiff's Reply to Defendants' Motion for Protection and Memorandum in Response to Plaintiff's Motion to Compel Defendants to Produce Documents and Deposition Witnesses, and for all other and further relief to which he may show himself to be justly entitled.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I, Edward W. Allred, hereby certify that I conferred with counsel for Defendants several times regarding the foregoing motion for leave and relief sought and they have not taken a position on this motion.

/s/ - Edward W. Allred
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the following attorneys of record in accordance with the Federal Rules of Civil Procedure on this 19th day of September, 2014:

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